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BY ECF and Email

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Jason Galanis, et al.*, S1 16 Cr. 371 (RA)

Dear Judge Abrams:

In response to the Court's recent order requesting that the defense advise the Court as to whether we are seeking a date for oral argument on our recently filed post trial-motions, I have conferred with counsel for Devon Archer and John Galanis and at this juncture we are seeking a date for oral argument. However, we note this request may change after considering the government's response to our motions which is due today and we will let the Court know if our position changes.

Additionally, the sentencing date in the above-referenced matter is scheduled for November 9, 2018. The Pre-Sentence Report was emailed to me on September 5, 2018. As already noted above, Mr. Cooney is awaiting the government's response to his pre-trial motions and his reply brief is due in one week. In light of the extensive trial record in this case, the fact that Mr. Cooney's reply brief is due in one week and consideration of the holidays next week (my children are off from school) pursuant to Rule 45(b) of the Federal Rules of Criminal Procedure, I am requesting that the Court extend the time for Mr. Cooney to file objections to the PSR until September 28, 2018. The Government does not object to this request.

Accordingly, based on the foregoing I am requesting oral argument on Mr. Cooney's post trial motions along with the other defendants in this case, and that the date for filing objections be extended to September 28, 2018.

Respectfully submitted,

/s/

Attorneys for Bevan Cooney
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